

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ABU BAKR LADD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:05CV916UNA
	)	(Judge Kyle)
ST. LOUIS BOARD OF POLICE	)	
COMMISSIONERS, et al.,	)	
	)	
Defendants.	)	

**MEMORANDUM TO THE COURT OF SIMILARLY FILED COMPLAINT**

This afternoon, through local media, it was brought to the attention of counsel for Defendant Jeffrey Pickering, that Plaintiff, through counsel, has filed a thirteen count, thirty-four page complaint, claiming nearly identical allegations of this case presently before this honorable court, in the United States District Court, Eastern District of Missouri. The undersigned counsel has not had an opportunity to fully review this new complaint, filed November 29, 2010, but wanted to bring this to the court's attention as it will need to be addressed before opening statements, set to begin Monday, December 6, 2010, if not before. Defendant Pickering has attached Mr. Ladd's complaint, along with attachments, and the docket report in case number 4:10-cv-02219-AGF, for this court's review.

Respectfully submitted,

**CHRIS KOSTER**

Attorney General

/s/ Dana C. Ceresia

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### **CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2010, the foregoing memorandum was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon:

Anser Ahmad  
105 N. Front Street  
Suite 106  
Harrisburg, PA 17101-1436  
Attorney for Plaintiff

/s/ Dana C. Ceresia

Assistant Attorney General